

U.S. Department  
of Transportation

United States  
Coast Guard



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5760

April 5, 1994

APR 5 1994

FCC-19

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

94-19

Dear Mr. Caton:

In accordance with 47 CFR Section 1.419, enclosed are ten (10) copies of U.S. Coast Guard Comments for filing in MM Docket No. 94-19, Implementation of Section 9 of the Communications Act; Assessment and Collection of Regulatory Fees for the 1994 Fiscal Year.

Sincerely,

A handwritten signature in cursive script, reading "Joseph D. Hersey".

J. D. HERSEY  
Chief, Spectrum Management and Radio  
Regulatory Branch  
U. S. Coast Guard  
By Direction

Encl: (1) Comments of U.S. Coast Guard

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APR 5 1994

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FCC - WASHINGTON

FEB 18 1994

The Honorable Reed E. Hundt  
Chairman, Federal Communications Commission  
1919 M Street, N.W.  
Washington, DC 20554

Dear Mr. Chairman:

As you are aware, the Omnibus Budget Reconciliation Act of 1993 requires the Federal Communications Commission to collect an annual regulatory fee for Private Radio Bureau shared use licenses. The Commission intends to propose regulations to establish a \$7 per year license fee for marine (ship) station licenses. The Coast Guard is concerned that the proposed license fee for marine (ship) station licenses, which cover 10 years and will result in a net \$110 fee, will discourage owners of vessels not required to carry radios, primarily recreational vessels, from carrying essential safety equipment, such as VHF marine radios, emergency position indicating radiobeacons (EPIRBs), and radar. This equipment, although not required on recreational vessels, greatly enhances safety and significantly improves the Coast Guard's ability to provide assistance in emergencies. This fee exceeds the cost of certain marine radios.

The Act allows the Commission to "waive, reduce or defer payment of a fee in any specific instance for good cause shown, where such action would promote the public interest." The Coast Guard believes that waiver of the marine (ship) station license regulatory fee for vessels which carry radio equipment, but are not required to do so, would enhance maritime safety and promote the public interest. Therefore, I ask that the Commission waive the fee for such vessels.

I also understand that the Commission is considering whether vessels not required to carry radio equipment, but doing so voluntarily, should continue to be required to have marine (ship) station licenses. The Coast Guard is concerned that the mariner's awareness of maritime radio regulations would diminish, and the integrity of our VHF National Distress System, bridge-to-bridge communications, and other safety communications would be jeopardized if vessels could carry radio equipment without being licensed. A station license provides a means for enforcement action even if an illegal transmission is not made by the owner of the vessel. Therefore, I ask that the Commission not remove this licensing requirement.

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Your assistance in these matters will certainly enhance maritime safety and be in the best interests of not only the mariner, but also the American public.

Sincerely,

A handwritten signature in cursive script, reading "J. W. Kime".

J. W. KIME

Admiral, U. S. Coast Guard  
COMMANDANT